

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS TO MODIFY STAY

All Cases: Debtor(s) Mark W. Kite

Case No. 20-07220

Chapter 13

All Cases: Moving Creditor MidFirst Bank

Date Case Filed March 13, 2020

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal

Chapter 13: Date of Confirmation Hearing _____ or Date Plan Confirmed June 3, 2020

1. Collateral
 - a. Home 10254 S 52nd Ave, Oak Lawn, IL 60453
 - b. Car Year, Make and Model _____
 - c. Other (describe) _____
2. Balance owed as of November 8, 2021 \$200,581.12
Total of all other liens including collateral \$ 0.00
3. In chapter 13 cases, attach a payment history listing the amount and dates of all payments received from the debtor(s) post-petition:
4. Estimated Value of Collateral (must be supplied in all cases) \$ 214,000.00
5. Default
 - a. Pre-Petition Default
Number of months 0.00 Amount \$ 0.00
 - b. Post-Petition Default
 - i. On direct payments to the moving creditor (Note: per Trustees records, Trustee disburses)
Number of months 3 Amount \$ 5,616.40
 - ii. On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. Lack of Adequate Protection § 362 (d) (1)
 - i. No Insurance _____
 - ii. Taxes Unpaid _____ Amount \$ _____
 - iii. Rapidly depreciating asset _____
 - iv. Other (describe) _____
 - b. No Equity and not Necessary for an Effective Reorganization § 362 (d) (2) _____
 - c. Other "Cause" § 362 (d) (1) _____
 - i. Bad Faith (describe) _____
 - ii. Multiple filings _____
 - iii. Other (describe) _____
 - d. Debtor's Statement of Intention regarding the collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: 11 / 15 / 2021

/s/ Richard B. Aronow
Counsel for Movant